

**From:** [ANDERSON Jim M](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)  
**Cc:** [GAINER Tom](#); [MCCLINCY Matt](#); [POULSEN Mike](#); [PETERSON Jenn L](#)  
**Subject:** DEQ Comments re: LWG's Sed Chemical Mobility Testing FSP  
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Chip & Eric,

Here are DEQ's comments on the LWG's 3/24/08 "*Sediment Chemical Mobility Testing FSP*".

1) Dredging Elutriate Tests (Sections 1.0 and 1.1)- The stated objective, and the corresponding proposed analytical testing, is to evaluate chemical mobility during "various physical removal and disposal scenarios" to facilitate FS evaluation of capping, dredging, containment, and disposal options. Since sediment samples will be collected from "worst case" areas of Portland Harbor that may be dredged, it is not clear why chemical mobility during dredging operations is not simultaneously evaluated by conducting DRET tests. Such data would provide useful input into the FS concerning dredging, containment, and monitoring.

2) BP Terminal 22T samples (Section 2.0 and Figure 2-1c)- The nearshore sediment sample LWM-C6D in iAOPC 6 (adjacent tot the BP/Arco Site) appears to be located within the temporary sheetpile containment system that is currently in place (see Figure 5-3 of the March 2007 *Revised Basis of Design Report, Revetment Source Control Measure* for the BP Bulk Terminal 22T Site). Besides access limitations, sediment within the sheetpile containment wall is planned to be removed starting in July 2008. The LWG's proposed sample location LWM-C6-C is within the secondary absorbant boom area and should be coordinated with facility personnel or their consultants.

3) SBLT in the presence of NAPL (Section 5.0)- As the document points out, the Sequential Batch Leaching Test (SBLT) is not appropriate if NAPL is present. If NAPL is present in any sample, the Pancake Column Leachate Test (PCLT) should be used instead of the SBLT for that sample.

4) Phthalates in iAOPC 11 (Tables 2-1 & 4-2)- Samples collected in iAOPC should also be analyzed for phthalates.

5) PAHs (Tables 2-2 and 4-2)- The site-wide maximum 95th for PAHs is strongly skewed by the very high PAH concentrations at Gasco. Since PAH contamination is widespread throughout Portland Harbor, PAH-contaminated sediment from at least one other iAOPC with elevated PAH concentrations other than Gasco should tested.

Jim Anderson  
Manager, DEQ Portland Harbor Section  
ph: 503.229.6825  
fax: 503.229.6899  
cell: 971.563.1434